

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JILL BABCOCK,
MARGUERITE MADDOX, and
ASHLEY JACOBSON, on behalf of
themselves and others similarly situated,

Case No. 22-cv-12951
Hon. Jonathan J.C. Grey
Mag. Judge Anthony P. Pattie

Plaintiffs,

v.

STATE OF MICHIGAN, COUNTY OF
WAYNE, CITY OF DETROIT, and
DETROIT-WAYNE JOINT BUILDING
AUTHORITY,

Defendants, jointly and severally.

/

COUNTY OF WAYNE'S INITIAL WITNESS LIST

Defendant, County of Wayne (“Wayne County” or Defendant”), by and through its attorneys, The Miller Law Firm, P.C., requests that Plaintiffs submit the following initial witness list identifying the persons it currently anticipates that it will or may call to testify at trial as follows:

1. Joan Grieg
Wayne County Assistant Director of Department of Facilities Management and Planning.
2. Daryl Jones
Director Wayne County Department of Facilities Management & Planning.

3. Andy Kandrevas
Assistant Wayne County Executive.
4. Gregory M. Hurst Jr.
Director of Wayne County Department of Facilities Management & Planning.
5. Jill Babcock, Plaintiff.
6. Marguerite Maddox, Plaintiff.
7. Ashley Jacobson, Plaintiff.
8. Current or former employees of and agents of the State of Michigan.
9. Current or former employees of and agents of the Detroit-Wayne Joint Building Authority.
10. Current or former employees of the City of Detroit.
11. Wayne County anticipates the use of expert witnesses, to be named.
12. Any persons named or mentioned in the complaint, amended complaints, or any pleading whether or not specifically named.
13. All persons listed on any a party's Witness List, Initial Disclosures, or amendments thereto.
14. Any persons providing an affidavit, declaration, or statement of any kind in connection with this lawsuit.
15. Any and all rebuttal witnesses, including expert witnesses.
16. Any impeachment witnesses.
17. Any person who becomes known through further discovery.
18. Any foundational witnesses necessary to establish and lay foundation for and/or to authenticate any documents, exhibits, or demonstrative

evidence which may be used at the time of trial.

Wayne County reserves the right to amend this Initial Witness List, as discovery is ongoing, and Plaintiffs have yet to respond to Defendant's discovery requests.

Respectfully Submitted,

THE MILLER LAW FIRM, P.C.

/s/ Angela L. Baldwin
Angela L. Baldwin (P81565)
Melvin B. Hollowell (P37834)
211 W. Fort Street, Suite 705
Detroit, MI 48226
(248) 841-2200
alb@millerlawpc.com
Attorneys for Wayne County
Defendants

Dated: January 10, 2025

CERTIFICATE OF SERVICE

I certify that on January 10, 2025, the foregoing document was served on all parties or their counsel of record by filing same with the Court's electronic filing system.

/s/ Eva D. Skoczylas